

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

21-cr-10104 (PBS)

VLADISLAV KLYUSHIN,  
a/k/a "Vladislav Kliushin"

Defendant

ASSENTED-TO MOTION FOR LEAVE TO  
FILE SENTENCING MEMORANDA BEFORE AUGUST 2, 2023

The United States respectfully moves this Court to permit the government and the defendant to file their sentencing memoranda in the above matter on or before August 2, 2023. As grounds for this request, the government respectfully submits that the defendant's sentencing has been continued for a short period; it requires additional time to address section 3553(a) sentencing factors relevant to the sentence it will ask the Court to pronounce; and defendant Klyushin will not be prejudiced by the extension of both parties' deadlines. Counsel for the defendant assents to the relief requested in this Motion.

Respectfully submitted,

JOSHUA S. LEVY  
Acting United States Attorney

By: /s/Seth B. Kosto  
SETH B. KOSTO  
STEPHEN E. FRANK  
Assistant U.S. Attorneys

Date: July 26, 2023

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the government's motion for leave to file an overlength memorandum will be served through Electronic Case Filing on counsel of records.

/s/Seth B. Kosto  
SETH B. KOSTO  
Assistant United States Attorney

July 26, 2023